ecology and environment, inc.
International Specialists in the Environment

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December 23, 1996

Ms. Gail Nabasny
START Project Officer
Emergency Support Section
U.S. Environmental Protection Agency
77 West Jackson Boulevard
Chicago, IL 60604

Re: GHR Foundry Site
Dayton, Montgomery County, Ohio
TDD: S05-9610-007
PAN: 6C0701SIXX

Dear Ms. Nabasny:

The United States Environmental Protection Agency (U.S. EPA) tasked the Superfund Technical Assessment and Response Team (START) contractor, Ecology and Environment, Inc. (E & E), under Technical Direction Document (TDD) S05-9610-007, to assist the U.S. EPA On-Scene Coordinator (OSC), Paul R. Steadman, with drum sampling at the GHR Foundry (GHR) site, a former foundry located at 400 Detrick Street in Dayton, Montgomery County, Ohio (Attachment A, Figure 1). In response to a request from the Ohio Environmental Protection Agency (OEPA), U.S. EPA had conducted an initial site assessment of the GHR site on April 10, 1996. The site assessment report from the April 10th investigation contains available information on site history, a detailed site description, and analytical results from the April 10, 1996, sampling; this report was submitted to U.S. EPA on August 26, 1996. The drum sampling event was intended to provide additional information, specifically on-site hazards, to augment the August 26, 1996, report.

The GHR site is an inactive, abandoned industrial property located on 11.8 acres at 400 Detrick Street in an industrial/commercial section of Dayton, Montgomery County, Ohio, located at latitude 39°46'10" N, longitude 84°10'53" W (Attachment A, Figure 2). The site is bounded on the north by a ditch and State Route 4, on the east by tracks owned by the Baltimore and Ohio Railroad, on the south by the Mad River, and on the west by an active business separated from the site by an alley.

During the April 10, 1996, site assessment, a cache of numerous drums was found in a concrete room on the north side of a partially demolished site building. According to an OEPA representative, the site owner, John Peloquin, claimed to have drained the original oil from numerous on-site transformers and other electrical equipment, and stored it in the drums in the concrete room. Some of this oil might contain elevated levels of polychlorinated biphenyls (PCBs), but the drums could not be sampled during the April 10th assessment, for technical reasons.

On October 15, 1996, START members Larry Lueck and Dan Robinson mobilized to the site and met OSC Steadman to sample the drums suspected of containing PCB oil. However, a large portion of the site to the north and east of the concrete room had been cleared of debris with heavy

equipment, presumably at the direction of the site owner, causing the entire north side of the partially demolished building to be blocked by a 6-foot-high pile of debris. A large iron door to the drum room of the concrete building had also been closed, presenting an additional impediment to accessing the drums. An open room to the east of the drum room contained only old cabinets, while a third room to the west, which had contained a pitched tent during the April 10th site assessment, was now empty.

The OSC requested that START sample three drums from another group of 23 drums standing in the southeast corner of the partially demolished building. Both START members donned level B protection, with the OSC providing backup. Three unlabeled drums with closed bungs were opened and sampled with drum thieves. Photoionization detector mesurements collected at the bung immediately after each drum was opened are included in Attachment C, Table 1.

Drum sample GHR-F-2 consisted of a clear, honey-colored, somewhat viscous fluid. Drum sample GHR-F-3 consisted of a black fluid resembling used motor oil. Drum sample GHR-F-4 consisted of a clear, colorless fluid that seemed less viscous than the first two samples and was suspected of being a solvent. At the OSC's request, the three samples were analyzed for PCBs and volatile organic compounds (VOCs) by National Environmental Testing, Inc. (NET), in Bartlett, Illinois. On November 22, 1996, the OSC authorized START to additionally request that NET perform a flash point test on sample GHR-F-4, the most solvent-like of the three fluid samples. Results of analysis of the three drum samples are presented in Attachment C, Table 1. Sample GHR-F-4 is hazardous waste based on the ignitability characteristic (flash point < 140°F) (40 Code of Federal Regulations [CFR] 261.21).

This report completes the requirements of the TDD. If you should have any questions or require additional information, please contact our office.

Sincerely,

Larry Lueck
START Project Manager

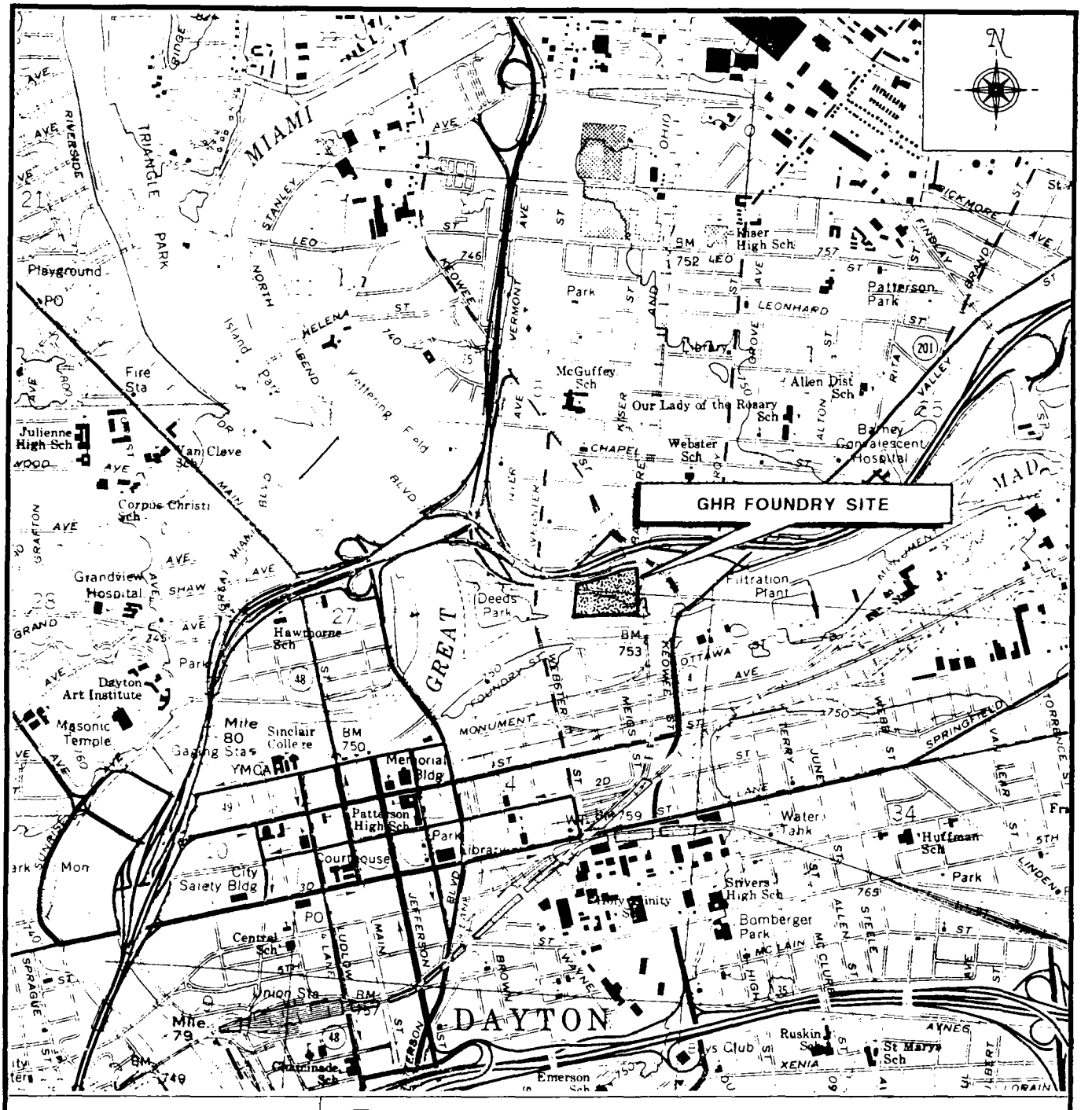
Thomas Kouris
START Program Manager

Attachments: A - Figures
B - Photolog
C - Analytical Results

cc: Paul R. Steadman, U.S. EPA OSC
TDD File

Attachment A

Figures



Quadrangle Location

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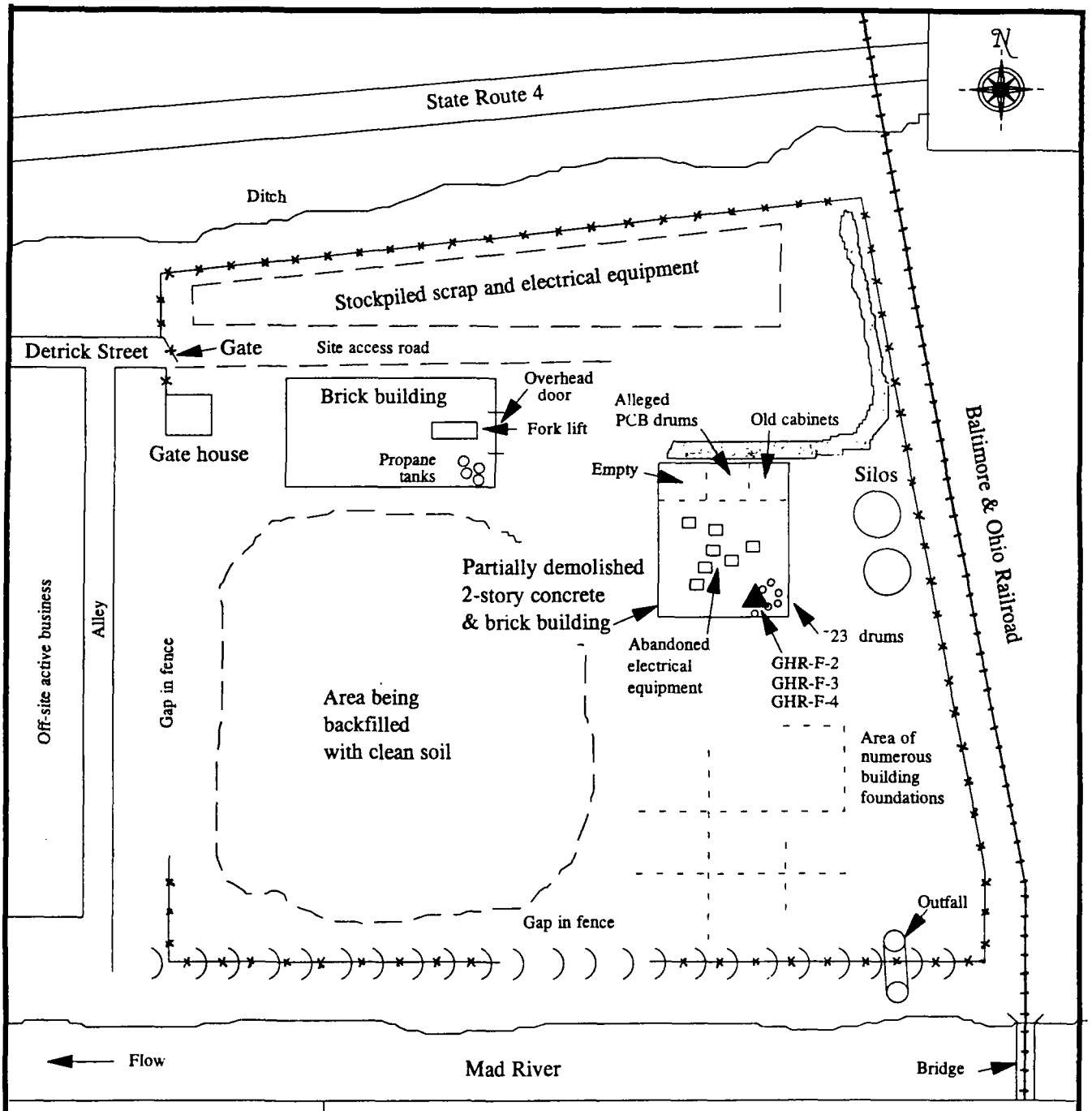
TITLE: Site Location Map	FIGURE #: 1
SITE: GHR Foundry Site	SCALE: 1:24,000
CITY: Dayton STATE: Ohio	TDD: S05-9610-007
SOURCE: U.S.G.S. Topographic Map, 7.5' Series Dayton North, Ohio Quadrangle	DATE: 1965 REVISED: 1981



Legend

- Fence
- Railroad tracks
- Sample location: ▲ GRH-X-X
- Old berm
- Debris piles

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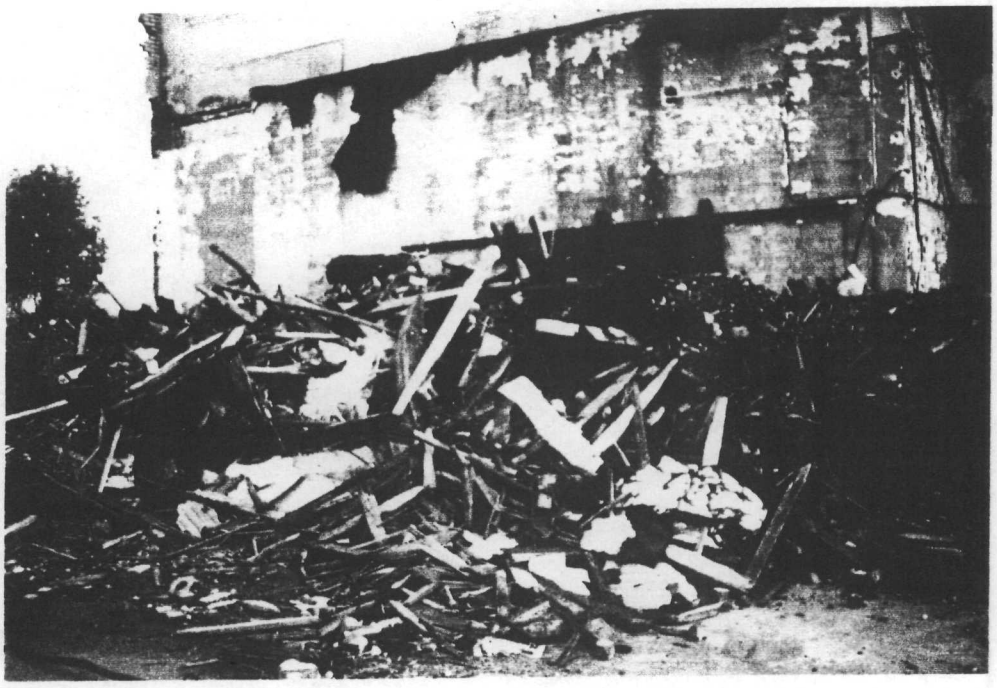
TITLE: Site Features and Sample Location Map	FIGURE #: 2
SITE: GHR Foundry Site	SCALE: not to scale
CITY: Dayton STATE: Ohio	TDD: S05-9610-007
SOURCE: Ecology & Environment, Inc.	DATE: 04/96 REVISED: 11/96

Attachment B

Photolog

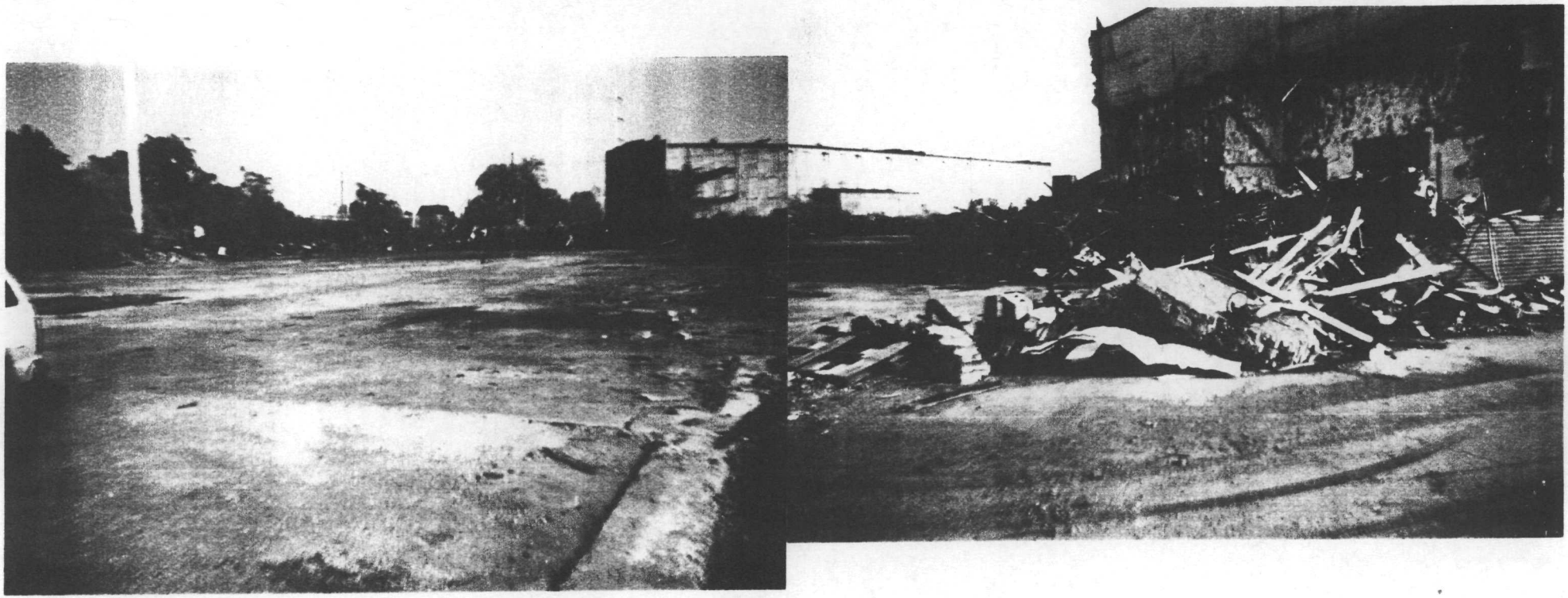


SITE NAME: GHR FOUNDRY
TDD #: S05-9610-007
DATE: OCTOBER 15, 1996
TIME: 1620
DIRECTION: SE
PHOTOGRAPHER: LARRY LUECK

SUBJECT: Drum room blocked by debris piles.

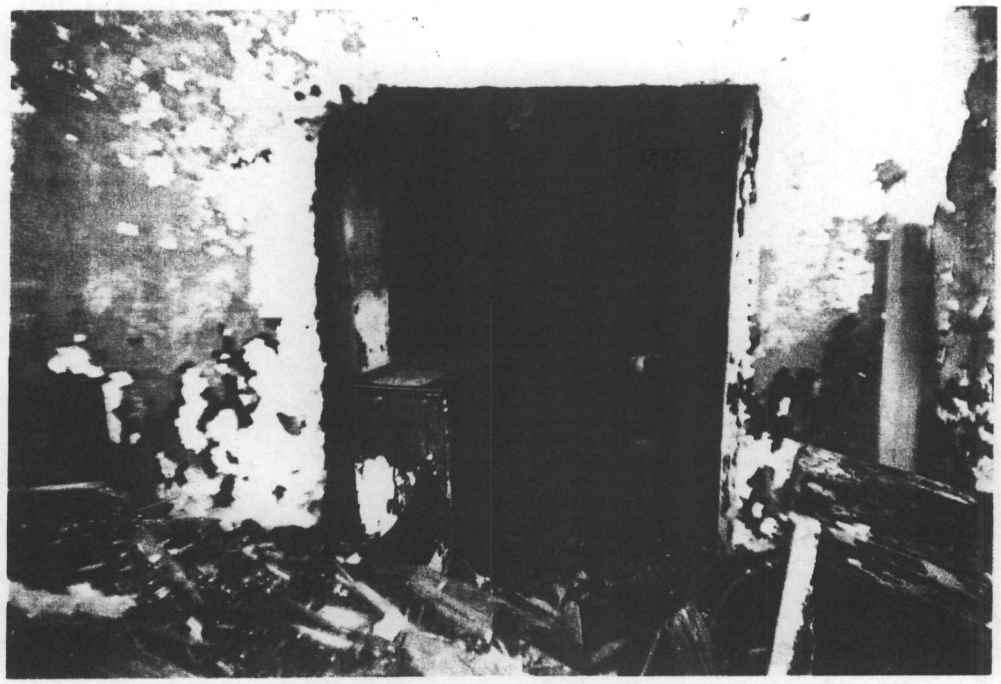
SITE NAME: GHR FOUNDRY
TDD #: S05-9610-007
DATE: OCTOBER 15, 1996
TIME: 1621
DIRECTION: S
PHOTOGRAPHER: LARRY LUECK

SUBJECT: Drum room blocked by debris piles.



SITE NAME: GHR FOUNDRY
TDD #: S05-9610-007
DATE: OCTOBER 15, 1996
TIME: 1628
DIRECTION: NE to SE
PHOTOGRAPHER: LARRY LUECK

SUBJECT: Panorama of NE corner of site, with blocked drum room, right.



SITE NAME: GHR FOUNDRY
TDD #: S05-9610-007
DATE: OCTOBER 15, 1996
TIME: 1623
DIRECTION: S
PHOTOGRAPHER: LARRY LUECK

SUBJECT: Room east of drum room, cabinets only.

SITE NAME: GHR FOUNDRY
TDD #: S05-9610-007
DATE: OCTOBER 15, 1996
TIME: 1630
DIRECTION: SE
PHOTOGRAPHER: PAUL R. STEADMAN

SUBJECT: One of several gas cyliners found on site.

SITE NAME: GHR FOUNDRY
TDD #: S05-9610-007
DATE: OCTOBER 15, 1996
TIME: 1635
DIRECTION: SE
PHOTOGRAPHER: LARRY LUECK

SUBJECT: Sampled drums, displaying sample numbers.

SITE NAME: GHR FOUNDRY
TDD #: S05-9610-007
DATE: OCTOBER 15, 1996
TIME: 1820
DIRECTION: NW
PHOTOGRAPHER: LARRY LUECK

SUBJECT: Big Blaster Air Canon cylinders found near drum sampling area.

Attachment C

Analytical Results

Table 1

SUMMARY OF ANALYTICAL RESULTS
GHR FOUNDRY SITE
DAYTON, OHIO
OCTOBER 15, 1996

Sample Designation	Matrix	PID At Bung (ppm)	Parameter	Result
GHR-F-2	Fluid/oil (honey - colored)	3.5	Total PCBs o-Xylene m,p-Xylenes	BD 30,000 µg/Kg 9,500 µg/Kg
GHR-F-3	Fluid/oil (black)	15	Total PCBs Ethylbenzene Toluene o-Xylene m,p-Xylene	BD 14,000 µg/Kg 5,000 µg/Kg 20,000 µg/Kg 57,000 µg/Kg
GHR-F-4	Fluid/oil (clear)	>100	Total PCBs Ethylbenzene Toluene o-Xylene m,p-Xylene Flash point	BD 140,000 µg/Kg 94,000 µg/Kg 750,000 µg/Kg 750,000 µg/Kg 123°F

Key:

PID = photoionization detector.
ppm = parts per million.
µg/Kg = micrograms per kilogram.
BD = below detection (includes all analyses not listed).

Source: National Environmental Testing, Inc. (NET), Bartlett, Illinois.
TDD S05-9610-804.